

### **REMARKS**

Claims 1, 2, 4, 5 and 7-18 are pending in this application. Claims 1, 14, and 17 have been amended.

In the Final Office Action of September 9, 2005, the Examiner rejected claims 1, 2, 4, 5, and 7-18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 6,101,946 to Martinsky in view of U.S. Pat. No. 4,080,607 to Van Breeman et al., and further in view of U.S. Pat. No. 5,615,958 to Furrow et al. Applicants submit that the combination of Martinsky, Van Breeman, and Furrow does not disclose all of the features of Applicants' claims. Therefore, Applicants respectfully request reconsideration.

Applicants incorporate by reference the comments in the previous responses to Office Actions in this application, which distinguish the cited prior art combination.

In particular, as set forth in Applicants' previous response, the Furrow patent does not disclose "two" "dowel pins" used to contact each ball mount, as required by independent claims 1 and 14. Instead, each mount in the Furrow patent includes only a single pin 136 terminating in a ball 138. Further, each of independent claims 1, 14, and 17 require a "semi-kinematic" mount. The single pin 136 of Furrow does not create a semi-kinematic mounting system in that the resulting mount can swivel about an axis of rotation. *Compare* Figures 11A, 11B, and 11C. *See* also Col. 6, lines 54-58 ("... enabling cartridge C to pivot or oscillate about the axis A-A under control of the oscillator mechanism previously described.") (emphasis added). Nor does Furrow show dowel pins that fit in dowel pin holes, as required by claim 1.

Further, claim 1 requires that one of the sets of dowel pins is oriented orthogonal to the other two sets of dowel pins. This feature allows the mount to be "semi-kinematic." The Furrow patent, which, as explained above in connection with Figures 11A, 11B, and 11C, can pivot or oscillate about an axis. Furrow, therefore, also does not teach this feature from claim 1.

Thus, not only is Furrow missing at least the claimed feature of "two" "dowel pins" from the claims, but it also teaches away from the claimed invention because the resulting mount of Furrow is not a semi-kinematic mount and can pivot, unlike Applicants' claimed invention. Thus, Furrow cannot properly be combined with Martinsky and Van Breeman to form the claimed invention.

The September 9, 2005 action does not respond to these arguments regarding the Furrow patent, most of which Applicants presented in its previous responses dated February 22, 2005 and June 13, 2005. Applicants respectfully request that the Examiner identify the portions of the Furrow patent that the Examiner alleges teach these features of the claimed invention if the Examiner maintains the current rejection of the claims.

Applicants also reiterate their position that Van Breeman fails to disclose Applicants' two "hardened" materials to form the contact points of the mounting system, as required by independent claims 1 and 14. In response to the Examiner's position in the Final Office Action, Applicants respectfully submit that the Van Breeman patent does not disclose "hardened" materials, such as stainless steel, for both mounts. Nor is it inherent in Van Breeman that the plastic housing is "hardened," as the Examiner acknowledges. Thus, the cited combination does not teach this feature of Applicants' claimed invention, and therefore cannot render the claims obvious.

The use of one hardened material for one side of a mount and the use of a softer insulating material for the other side of a mount (as in the Van Breeman patent) could have certain advantages for some applications. However, Applicants' claimed invention requires "hardened" materials for both ends of the mount, which is important in Applicants' claimed invention so that the components can withstand stresses induced by printhead attachment and operation. *See* specification at pages 8-9.

Finally, with respect to independent claims 1, 14, and 17, as Applicants have previously asserted, the cited combination of prior art does not teach a "non-adjustable" mounting system. Claims 1 and 14 have been amended in this response to include this feature. A non-adjustable system allows for rapid attachment of a printhead, without requiring time-consuming adjustments. Thus, such a non-adjustable approach can be repeated more easily than an adjustable approach.

Applicants' failure to address the Examiner's rejections of the dependent claims should not be construed as an acquiescence to such rejections, but a recognition that such rejections are moot based on the dependency from an allowable independent claim.

As the Examiner knows, a *prima facie* case of obviousness requires a suggestion or motivation to combine, a reasonable expectation of success, and a teaching or suggestion of all

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claim limitations. (MPEP §2143.) As Applicants have shown, the cited combination fails to disclose all of the claim limitations, lacks a motivation to combine the prior art, and teaches away from the claimed invention.

For the reasons stated above, Applicants believe that the claims now pending in this application are allowable. Applicants respectfully request reconsideration and allowance.

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